



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 12 2012

REPLY TO THE ATTENTION OF:

Jonathan Lamb
Senior Air Quality Analyst
Michigan Department of Environmental Quality
Detroit Field Office
Cadillac Place
3058 West Grand Boulevard, Suite 2-300
Detroit, Michigan 48202-6058

Dear Mr. Lamb:

The U.S. Environmental Protection Agency has reviewed the proposed Renewal Operating Permit MI-ROP-A8640-200X for Severstal Dearborn, LLC. To ensure that the source meets Federal Clean Air Act requirements, that the permit will provide necessary information so that the basis of the permit decision is transparent and readily accessible to the public, and that the permit record provides adequate support for the decision, EPA has the following comments.

1. The visible emission (VE) and opacity limits on pages 19, 21, 23, 27, 33, 38, 45, 49, 53, 58, 61, 70, 74, 78, 97, 102, 137, and 139 have requirements for ve or Method 9 observations on a biweekly basis, monthly basis, or quarterly basis. In some cases, only a testing method is specified without a frequency. In light of the public concerns expressed about zero-transparency plumes and the requirement at 40 C.F.R. § 70.6(c)(1) for "compliance certification, testing, monitoring, reporting, and recordkeeping requirements sufficient to assure compliance with the terms and conditions of the permit," we recommend that the permit record include an analysis of the sufficiency of the aforementioned observation and testing requirements to assure compliance with the VE and opacity limits. If the observation and testing requirements are not sufficient, we recommend that their required frequency be increased to the point that they yield sufficient data to assure compliance.
2. The following requirement is on pages 16 and 135:

When the odor of hydrogen sulfide (H_2S) is found to exist beyond the property line of Severstal Dearborn, LLC, the permittee shall not cause or allow the concentration of H_2S to exceed 0.005 parts per million by volume (ppmv) for a maximum period of 2 minutes. (R 336.1406(2))

Because the affected residents are significantly concerned about odor, we believe the permit record should clarify how the odor of H_2S is defined and distinguished from other odors, how far beyond the property line the provision applies, and how compliance with the 0.005 ppmv H_2S limit will be demonstrated while it is in effect. In light of the public

concerns, we would also like you to consider making the limit always applicable instead of applicable only when odor is detected.

3. Pages 19, 23, 27, 38, 53, 61, 70, 74, and 97 have Particulate Matter (PM) limits (expressed as grains per dry standard cubic foot or pounds per hour) with VE observations and/or pressure drop used as a compliance method. However, a direct correlation between compliance with the PM limits and VE or pressure drop has not established in the permit record. We believe the permit record should be amended to establish this correlation.
4. The following emission limits use monthly fuel records, and/or stack test-based emission factors for compliance. In light of citizen concerns about insufficient stack testing and the requirement for monitoring sufficient to assure compliance at 40 C.F.R. § 70.6(c)(1), we recommend that the permit record include an analysis of the sufficiency of the fuel records and/or emission factors to assure compliance with the emissions limits. If the fuel records and/or emission factors are not sufficient, we recommend that improved monitoring methods such as Continuous Emissions Monitoring Systems be used to assure compliance.

Page Emission limit

25	NOx 36 lb/hr
25	NOx 136.6 tpy
25	SO2 70.9 lb/hr
25	CO 661.1 lb/hr
38	NOx 9/77 tpy

5. For compliance assurance, the following emission limits rely on monthly equipment inspection, testing once or twice per permit term, or no monitoring, recordkeeping, reporting, or testing. We are concerned that there may not be sufficient monitoring, recordkeeping, reporting, and emission testing requirements to satisfy 40 C.F.R. § 70.6(c)(1) and recommend that believe that such requirements be established for these limits.

Page Emission limit

35	NOx 106.3 lb/hr
35	CO 2195 lb/h3
38	PM 11.17 lb/hr
38	SO2 23.03 lb/hr
38	NOx 2.45 lb/hr
39	VOC 6.77 lb/hr
39	Mn .00256 lb/hr
39	Pb .00015 lb/hr
53	PM 2.09 lb/hr
53	PM10 .0074 gr/dscf

53 PM10 1.55 lb/hr
 54 Mn .00064 lb/hr
 54 Pb .000278 lb/hr
 61 PM .0152 gr/dscf
 61 PM 50.94 lb/hr
 61 PM10 .0113 gr/dscf
 61 PM10 37.70 lb/hr
 61 NOx 52.94 lb/hr
 61 CO 3057.4 lb/hr
 70 Pb .0224
 74 Pb .0128 lb/hr
 78 CO 2.42 lb/hr
 97 PM 7.45 lb/hr
 97 PM10 .00135 gr/dscf
 97 PM10 3.35 lb/hr
 97 NOx 10.17 lb/hr
 97 Mn .101 lb/hr
 97 Mn .0709 lb/hr
 97 Hg .0125 lb/hr
 97 Pb .067 lb/hr

6. On pages 27, 28, 49, 54, 62, 71, and 74, the permit requires, under 40 C.F.R. Part 63 Subpart FFFFF, the development and implementation of written startup, shutdown and malfunction (SSM) plans for B and C Blast Furnace Cast Houses, Basic Oxygen Furnace (BOF) Reloading South, Desulfurization Operation, BOF vessels, and Ladle Refining Facility No. 1 and 2. Since the source has been subject to Subpart FFFFF since 2006, the SSM plans should already been developed and implemented. The permit record should clarify whether the SSM plans have been developed and implemented.
7. For B Blast Furnace (p. 28), C Cast Furnace, (p. 39), and the two BOFs (p. 97-98), the permit requires the submission of 98% collection efficiency certifications. As this is an existing source, these certifications should already have been submitted. The permit record should clarify whether the certifications have been submitted.
8. Under Subpart FFFFF, the permit requires Continuous Parametric Monitoring Systems (CPMS) "if applicable" on pages 29, 40, and 98. For this existing source, the permit record should clarify whether CPMS is required. Even if CPMS is not required under Subpart FFFF, we recommend that the permit provide for it in light of the significant public concerns.
9. On p. 95, the permit cites the following Subpart FFFFF provision for B & C Blast Furnaces:

The permittee shall demonstrate continuous compliance for each affected source subject to an emission limit or opacity limit in 63.7790(a) as specified in 40 CFR Part 63 Subpart FFFFF 63.7833(a). (40 CFR Part 63 Subpart FFFFF 63.7833(a))

This provision requires a form of continuous compliance for any of the applicable emission limits listed in Table 1 of Subpart FFFFF. However, none of the emission limits in Table 1 appear on pages 94 and 95. The permit record should clarify why the emission limits from Table 1 are not included in the permit.

10. Please describe Severstal Dearborn's compliance status with the fallout mitigation plans on pages 113 and 144-145 of the permit as well as any corrective actions currently underway for violations of these plans.

We appreciate the opportunity to provide comments on this proposed permit. We do not plan to formally object to the permit. Please feel free to contact me or Kaushal Gupta, of my staff, at (312) 886-6803 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Genevieve Damico".

Genevieve Damico
Chief
Air Permits Section